

## REMARKS

### 1. Summary of the Office Action

In the Office Action mailed July 7, 2009, the Examiner rejected claims 65-88 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,175,789 ("Beckert").

### 2. Status of the Claims

Applicant respectfully traverses the rejection. Applicant respectfully submits that claims 65-88 are in condition for allowance and respectfully request notice to this effect. Of these claims, claims 65 and 81 are independent. Applicant has amended claims 66, 68, 69, 72, 77, 82-83, and 86-87.

### 3. Response to Rejections

As noted above, the Examiner rejected claims 65-88 under 35 U.S.C. 102(e) as being anticipated by Beckert. The Applicant respectfully traverses these rejections.

#### A. The Beckert Reference fails to disclose "authenticating devices connected to the AMI-C bus"

As explained in the response to the Office Action mailed January 16, 2009, claim 65 recites a method including "authenticating devices connected to the AMI-C bus at the gateway device using an application processor" and claim 81 recites a gateway device including an "application processor . . . adapted to (i) authenticate AMI-C devices connected to the AMI-C bus." Applicant maintains that Beckert fails to disclose these elements, and thus the Examiner clearly erred in rejecting claims 65-88 under § 102(e).

The Examiner stated that Applicant's arguments filed on April 13, 2009 have been fully considered but are not persuasive. (Office Action, page 6.) In addressing Applicant's argument that Beckert fails to disclose "authenticating devices connected to the AMI-C bus," the Examiner cited to column 7, lines 20-60 of Beckert in the Response to Arguments section of the July 7, 2009 Office Action. Applicant respectfully disagrees that this cited portion of Beckert shows or suggests authenticating devices connected to the AMI-C bus. The Applicant notes that the Examiner did not offer an explanation as to why or how this cited portion of Beckert discloses authenticating devices connected to the AMI-C bus. However, a detailed review of the cited sections reveals that the cited section is completely silent as to authenticating devices connected to the AMI-C bus.

For clarity, the entire section cited by the Examiner is reproduced below:

The security system 146 is connected to actuators which lock/unlock doors and windows, and to an alarm which can be activated upon detection of unwanted tampering. An OBD (On Board Diagnostic) interpreter 128 is provided in the computer module to communicate with the OBD system built into the vehicle by the manufacturer. The OBD interpreter 116 interprets the status data received and provides performance related information from the vehicle's OBD system to the microprocessor 100. Also, commands can be provided to the interpreter which allows non-critical car systems to be controlled.

A more detailed explanation of the three modules in the vehicle computer system is provided in co-pending U.S. patent application Ser. No. 08/564,586 entitled "Vehicle Computer System," which was filed on Nov. 29, 1995 in the names of Richard D. Beckert, Mark M. Moeller, and William Wong. This application is assigned to Microsoft Corporation and is incorporated herein by reference.

The logic unit 90 within the support module 62 is configured with its own multi-bit bus structure that is separate from the bus of the microprocessor 130 of the computer module 64. The logic unit 90 and microprocessor 130 are interfaced using a bus, such as PCI bus 66. By configuring the logic unit 90 with its own bus, the logic unit 90 is capable of better performing its tasks independent of intervention from the microprocessor 130. Moreover, the internal bus of the logic unit 90 facilitates data communication between the audio components and other serial devices while using minimal processing resources of the microprocessor 130.

FIG. 4 shows a preferred implementation of an internal bus structure 140 of the logic unit 90 of the support module and the interface between the internal bus 140 and external devices. The internal multi-bit bus structure 140 includes an address bus 142, a data bus 144, and a control bus 146. In the illustrated implementation, the data bus 144 is a 32-bit bus and the address bus 142 is a sufficiently large to support in parallel at least 19 address bits, such as through a 32-bit bus. The busses are tri-state busses which are driven by one of several sources. An internal bus arbiter 148 determines which device is in control of the bus structure 140.

At no point does this cited section deal with authenticating devices connected to an AMI-C bus. Applicant recognizes that the first paragraph of this section discusses a security system connected to an alarm which can be activated upon detection of unwanted tampering. (See column 7, lines 20-23.) Thus, Beckert discloses a security system, but this security system does not authenticate devices connected to an AMI-C bus. Rather, the security application of Beckert monitors security sensors 26 for any potential threat of theft or vandalism. (See, column 7, lines 16-19.) However, this described security function is different than providing security for devices connected to or connecting to an AMI-C bus. Significantly, there is no disclosure or suggestion of the security system authenticating devices connected to an AMI-C bus.

The remaining cited portions do not even deal with security, much less providing security functions for an AMI-C bus, such as authenticating devices connected to the AMI-C bus. For example, column 7, lines 23-30 discloses an On Board Diagnostic (OBD) Interpreter that can receive commands to allow for non-critical car systems to be controlled. Further, column 7, lines 38-49 deals with details regarding logic unit 90 within the support module 62 that is separate from microprocessor 130. The logic unit is capable of performing tasks independent of intervention from the microprocessor because the logic unit is configured with its own bus. Still further, column 7, lines 50-60 discusses a multi-bit bus structure 140 that includes an address bus, a data bus, and a control bus. However, these disclosures of the OBD interpreter, logic unit 90, and the multi-bit bus structure 140 clearly do not amount to disclosures of authenticating devices connected to an AMI-C bus. In light of the above, it is clear that this cited section of Beckert does not disclose what the Examiner asserts that it does.

Because Beckert does not show or suggest authenticating devices connected to the AMI-C bus at the gateway device using an application processor, Beckert does not show or suggest every element of claims 65 and 81. Accordingly, Applicant submits that Beckert does not anticipate claims 65 or 81 for at least this reason.

Furthermore, claims 66-80 and 82-88 depend from claims 65 and 81, respectively. Accordingly, Applicant submits that Beckert does not anticipate claims 66-80 and 82-88 for at least these same reasons described above with reference to claims 65 and 81.

In light of the above, Applicant respectfully requests withdrawal of the rejections under 35 U.S.C. § 102(e).

#### **4. Conclusion**

The Applicant respectfully requests reconsideration of the rejections of the previously-presented claims. For the foregoing reasons, the Applicant believes the previously presented claims are allowable. Applicant respectfully requests notice to this effect. The Examiner is requested to contact Applicant's representative below at 312-913-0001 if any questions arise or he may be of assistance to the Examiner.

Respectfully submitted,

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